

ANDREW S. T. FRITZ, LTD.  
Laura L. Fritz, Esq.  
Nevada Bar No. 6568  
Andrew Fritz, Esq.  
Nevada Bar No. 6649  
625 South Sixth Street  
Las Vegas, NV 89101  
Ph: (702) 383-5155  
Fax: (702) 383-2865  
contact@fritzlawyers.com  
Attorney for Debtor(s)

E-Filed on: October 25, 2012

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

IN RE:

BK-S-12-19323-lbr  
Chapter 13

KENNETH LEE JOHNS (XXX-XX-8266)  
SHANNON MARIE TANNER (XXX-XX-1079)

Debtor(s)

Date: November 29, 2012  
Time: 2:30 p.m.  
Trustee: Kathleen A. Leavitt

**MOTION TO BIFURCATE CHAPTER 13 CASE NUMBER BK-S-12-19323-LBR AND  
CONVERT CO-DEBTOR TO CHAPTER 7**

COMES NOW, the Debtors, KENNETH LEE JOHNS AND SHANNON MARIE  
TANNER, by and through their counsel, LAURA L. FRITZ, ESQ., and file this motion for an  
Order to Bifurcate this Chapter 13 Case Number 12-19323-lbr allowing Debtor KENNETH LEE  
JOHNS to continue in this Chapter 13 Bankruptcy and Convert Co-Debtor SHANNON MARIE  
TANNER to a Chapter 7 under a new case number, for the following reasons.

1. Debtors filed a Voluntary Petition for relief under Chapter 13 of the Bankruptcy Code on August 10, 2012.
2. Debtors will soon start the process of obtaining a divorce.
3. Debtor Mr. Johns needs to keep his vehicle, so he must remain in the Chapter 13.
4. Co-Debtor Mrs. Tanner qualifies for Chapter 7 and needs to be in a Chapter 7 to resolve her debt.

WHEREFORE, Debtors pray that this Court grant their Motion to Bifurcate Chapter 13 Case Number BK-S-12-19323-lbr and Convert Co-Debtor to Chapter 7 under a new case number.

Dated: 24 Oct 2012

Laura L. Fritz  
Laura L. Fritz, Esq.

1  
2  
3  
4  
5 ANDREW S. T. FRITZ, LTD.  
6 Laura L. Fritz, Esq.  
7 Nevada Bar No. 6568  
8 Andrew Fritz, Esq.  
9 Nevada Bar No. 6649  
10 625 South Sixth Street  
11 Las Vegas, NV 89101  
12 Ph: (702) 383-5155  
13 Fax: (702) 383-2865  
14 contact@fritzlawyers.com  
15 Attorney for Debtor(s)

16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA

IN RE:

BK-S-12-19323-lbr  
Chapter 13

KENNETH LEE JOHNS (XXX-XX-8266)  
SHANNON MARIE TANNER (XXX-XX-1079)

Debtor(s)

Date: November 29, 2012  
Time: 2:30 p.m.  
Trustee: Kathleen A. Leavitt

**[PROPOSED] ORDER RE: MOTION TO BIFURCATE CHAPTER 13 CASE  
NUMBER BK-S-12-19323-LBR AND CONVERT CO-DEBTOR TO CHAPTER 7**

The Debtors, KENNETH LEE JOHNS AND SHANNON MARIE TANNER, by and  
through their counsel, LAURA L. FRITZ, ESQ., of ANDREW S. T. FRITZ, LTD., having filed the  
MOTION TO BIFURCATE CHAPTER 13 CASE NUMBER BK-S-12-19323-LBR AND  
CONVERT CO-DEBTOR TO CHAPTER 7, no responses or oppositions having been filed, a  
hearing having been held on the above date and time, and good cause appearing, it is

ORDERED that Debtors' Motion is granted. It is further

ORDERED that Debtor KENNETH LEE JOHNS be allowed to continue in this current  
Chapter 13 under the case number 12-19323-lbr. It is further

1 ORDERED that Co-Debtor, SHANNON MARIE TANNER, be allowed to bifurcate from  
2 this case, be assigned a new case number and convert to a Chapter 7.

3  
4 In accordance with LR 9021, counsel submitting this document certifies that the order accurately  
5 reflects the court's ruling and that (check one):

6 ☐ The court has waived the requirement of approval under LR 9021(b)(1).

7 ☐ No party appeared at the hearing or filed an objection to the motion.

8 ☐ I have delivered a copy of this proposed order to all counsel who appeared at the  
9 hearing, and any unrepresented parties who appeared at the hearing, and each has  
10 approved or disapproved the order, or failed to respond, as indicated below [list each  
11 party and whether the party has approved, disapproved or failed to respond to the  
12 document]:

13 XX I certify that this is a case under Chapter 7 or 13, that I have served a copy of this  
14 order with the motion pursuant to LR 9014(g), and that no party has objected to the form  
15 or content of the order.

16 Submitted by:

17 ANDREW S. T. FRITZ, LTD.

18 /S/ Laura L. Fritz, Esq.

19 Laura L. Fritz, Esq.

20 Attorney for Debtor(s)

21  
22  
23  
24  
25  
26  
27  
28  
###